

# EXHIBIT A

1 [Counsel Listed on Signature Pages]  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

*People of the State of California, et al.*

*v.*

*Meta Platforms, Inc., Instagram, LLC, Meta  
Payments, Inc., Meta Platforms Technologies, LLC*

*Office of the Attorney General, State of Florida  
Department of Legal Affairs*

*v.*

*Meta Platforms, Inc., Instagram LLC*

MDL No. 3047

Case No. 4:23-cv-05448-YGR

4:23-cv-05885-YGR

Honorable Yvonne Gonzalez Rogers

**META DEFENDANTS' FOURTH  
REQUEST FOR PRODUCTION OF  
DOCUMENTS TO PLAINTIFF STATE  
OF NEW JERSEY**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

4:23-cv-05448

1                   **META DEFENDANTS' FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS**  
2                   **TO PLAINTIFF STATE OF NEW JERSEY**

3                   Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., and Meta Platforms  
4                   Technologies, LLC (collectively, "Defendants"), pursuant to Federal Rules of Civil Procedure 26 and  
5                   34, hereby propound the following Fourth Request for Production of Documents to Plaintiff State of  
6                   New Jersey ("Plaintiff"). These Requests are to be responded to fully and separately as required by the  
7                   Federal Rules of Civil Procedure.

8                   Defendants request that Plaintiff serve its responses to these Requests upon counsel for  
9                   Defendants at Covington & Burling LLP; 1999 Avenue of the Stars, Los Angeles, California, 90067-  
10                  4643 within thirty (30) days. The following Definitions and Instructions are applicable to these  
11                  Requests:

12                  **DEFINITIONS**

13                  1.         The term "communication" means the transmittal of information (in the form of facts,  
14                   ideas, inquiries or otherwise).

15                  2.         "Document" or "documents" shall have the meaning set forth in the Order Governing the  
16                   Production of Electronically Stored Information and Hard Copy Documents entered in this action ("ESI  
17                  Order"). *See* ECF No. 690.

18                  3.         "Relating" or "related to" means and includes referring to, concerning, referencing,  
19                   mentioning, associated with, constituting, discussing, containing, embodying, recording, reflecting,  
20                   identifying, summarizing, incorporating, and/or dealing with or pertaining to in any way.

21                  4.         "Identify" when used in reference to:

22                   a.         a natural individual, requests that individual's full name, occupation, current or  
23                   last known residential and business addresses, and current or last known residential and business  
24                   telephone numbers;

25                   b.         a document, requests the nature of the document (*e.g.*, letter or memorandum), its  
26                   title, its date, the name(s) of its authors and recipients, and its present location or custodian;

1           c.        a communication, requests the identification of any document(s) that evidence the  
2 communication, an identification of the person(s) participating in the communication, and the  
3 date, and substance of the communication.

4       5.        “Action” refers to the present proceeding which was commenced by Plaintiff’s filing of the  
5 Civil Enforcement Complaint on October 24, 2023, in the United States District Court for the Northern  
6 District of California.

7       6.        “Plaintiff”, “You”, “you”, “Your” and “your” means the State, including but not limited  
8 to the executive and legislative branches, agencies, offices, departments, divisions, commissions,  
9 committees, agents, employees, boards, instrumentalities, vendors (to the extent the State has possession,  
10 custody, or control over them), administrators, and other persons or entities acting on behalf of the State,  
11 including but not limited to the agencies and other entities whose information has been deemed within the  
12 State’s control for the purposes of discovery in Magistrate Judge Kang’s September 6, 2024 order (ECF  
13 No. 1117) and any other related entities.

14       7.        “Defendants” refers to Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., and  
15 Meta Platforms Technologies, LLC.

16       8.        “And” includes “or”, and vice versa.

17       9.        The singular form of a word or term includes the plural, and vice versa.

18       10.      The present tense of a verb includes the past tense, and vice versa.

19       11.      The use of the article “the” shall not be construed as limiting the scope of any request.

20       12.      “Including” means “including without limitation”.

21       13.      “Any” includes “all”, and vice versa.

22       14.      “State” means the State of New Jersey.

23       15.      The capitalized version of a word or term includes the lower case version of a word or  
24 term, and vice versa.

25       All words, terms, and phrases not specifically defined herein are to be given their normal and  
26 customary meaning in the context in which they are used in these Requests.

**INSTRUCTIONS**

1        1. Plaintiff is requested to furnish all documents and information in Plaintiff's possession,  
2 custody, or control, to the extent not privileged. Documents held by any office, department, agency, board,  
3 commission, or instrumentality of the state are within Plaintiff's possession, custody, or control.  
4

5        2. If Plaintiff objects to furnishing any of the documents or information requested by these  
6 Requests based on a claim of attorney-client privilege, work product protection, or any other applicable  
7 privilege or claim of protection, such information should be redacted and/or logged in accordance with  
8 the Order Regarding Protected Counsel Communications and Governing Privilege Log Protocol entered  
9 in this action. *See ECF No. 740.*

10        3. If Plaintiff objects to any Request on the grounds that it is vague or ambiguous, state: (i)  
11 the portions or terms of such Request that Plaintiff claims to be vague or ambiguous; and (ii) the  
12 interpretation of the Request pursuant to which Plaintiff provides a response.

13        4. These Requests are deemed to be continuing in nature and require Plaintiff to timely serve  
14 supplemental responses or productions in accordance with Rule 26(e) of the Federal Rules of Civil  
15 Procedure, up to and including the time of a trial or hearing in this matter. All supplemental responses  
16 shall include the date upon which and the manner in which such further or different information was  
17 acquired or became known to Plaintiff.

18        5. If Plaintiff cannot fully respond to a particular Request after exercising due diligence to  
19 make inquiry and to secure the necessary information, provide a response to the extent possible, specifying  
20 Plaintiff's inability to respond to the remainder and providing whatever information or knowledge Plaintiff  
21 has concerning the portion not responded to.

22        6. All responsive and non-privileged or redacted documents shall be produced in the format  
23 ordered by the Court in the ESI Order.

24        7. Unless otherwise specified, the time period for these Requests is September 17, 2024 to  
25 October 30, 2024.

**SPECIFIC REQUESTS FOR PRODUCTION**

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2 1. All Documents Relating to or reflecting any communication with the State Attorney  
3 General's Office regarding or Relating to Instagram Teen Accounts.

4 **RESPONSE:**

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7 Respectfully submitted,

8 Dated: March 4, 2025

9 COVINGTON & BURLING LLP

10 By: /s/ Ashley M. Simonsen

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21 *Attorney for Defendants Meta Platforms,  
Inc. f/k/a Facebook, Inc.; Instagram,  
LLC; Meta Payments, Inc.; and Meta  
Platforms Technologies, LLC*

## **CERTIFICATE OF SERVICE**

I hereby certify that on March 4, 2025, a true and correct copy of Meta Defendants' Fourth Request for Production of Documents to Plaintiff State of New Jersey were served upon the following by email:

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Section Chief, Deputy Attorney General  
Thomas Huynh  
Assistant Section Chief, Deputy Attorney General  
Verna J. Pradaxay  
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*Attorneys for Plaintiff State of New Jersey*

By: /s/ Ashley M. Simonsen  
Ashley M. Simonsen

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